

# EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
COLUMBUS DIVISION**

<b>MARK CHANGIZI,</b>	)	
<b>MICHAEL P. SENGHER,</b>	)	
<b>DANIEL KOTZIN,</b>	)	
<i>Plaintiffs,</i>	)	<b>COMPLAINT</b>
	)	<b>FOR DECLARATORY AND</b>
v.	)	<b>INJUNCTIVE RELIEF</b>
	)	
<b>VIVEK MURTHY, United States</b>	)	
<b>Surgeon General, and</b>	)	
<b>XAVIER BECERRA,</b>	)	
<b>Secretary of the Department</b>	)	<b>JURY TRIAL DEMANDED</b>
<b>of Health and Human Services,</b>	)	
	)	
<i>Defendants.</i>	)	

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**DECLARATION OF MARK CHANGIZI**

1. I, Mark Changizi, am over the age of 18 and make this Declaration in support of the motion for a Preliminary Injunction in my case against the United States Surgeon General, et al.

2. I make this Declaration based on personal knowledge.

3. I am a broadly trained scientist (math/physics undergrad, PhD in math, postdocs in psychology and theoretical neuroscience) and have been a researcher in a variety of fields for 25 years. For more than 15 years I have been a public-facing scientist -- I write for magazines, appear on science TV shows, speak worldwide, do a YouTube series, and have six books on my research. Historically apolitical, when Covid entered the picture I realized there were many deep

misunderstandings of the data and evidence leading to panicked decisions being made, and I endeavored to explain what the evidence actually says. Furthermore, as someone with expertise on psychology and the evolution of culture, I have also been spending considerable effort communicating emergent societal phenomena, the illogical biases humans have (on both sides of the Covid debate), and the importance of free expression in society (the subject of my institute, Free Expression Group).

4. I live in Columbus, Ohio.

5. I have approximately 37,000 followers on Twitter, having created my account in April 2013.

6. On April 20, 2021, I received a 12-hour suspension for linking to an article on the safety and efficacy of face masks, an article housed at the NIH web site. The following tweet was cited as cause:

New Review: Masks Ineffective, Harmful. “The existing scientific evidences challenge the safety and efficacy of wearing facemask as preventive intervention for COVID-19.

7. On approximately June 25, 2021, I received a 7 -day suspension, and the email from Twitter just had blank spaces where the usual offending material would be, so I was never sure why I was suspended.

8. Around December 1, 2021, I learned my account was being heavily censored and deboosted (this means, among other things, that the user’s tweets are de-platformed—they appear in Twitter feeds much less frequently and replies to other posts may be hidden). First, I had noticed that I was no longer gaining followers, and my engagement had fallen precipitously. Second, followers reported to me that they were no longer seeing my tweets, and that when they searched

on me I would either not come up or appear only when the final letter was added, and -- if they did find me via a search -- that my account was labeled as “sensitive”.

9. I was permanently suspended on December 18, 2021, again for “spreading misleading and potentially harmful information related to COVID-19.” The following two tweets were cited as the cause:

- a. “Covid is 10 to 20 times less dangerous than flu for kids. Get. A. Grip. There is NO long term data for the shot. And even the short and medium term data for that age group are ambiguous at best.”
- b. “Asymptomatics rarely spread it ~ Vaccinations don’t slow spread ~ unvaxxed pose no threat to vaxxed ~ Risks are broadly flu like (and safer than flu for < 40) ~ Huge % of unvaxxed have superior natural immunity via recovery.”

10. The email warned me that any “attempt to evade a permanent suspension by creating new accounts” would result in suspension of those accounts.

11. I appealed the suspension on Christmas Day of 2021. I wrote that:

You have permanently suspended me for speaking out as a scientist concerning the evidence-based dangers of Covid and the efficacy & ethics of the interventions.

Ironically, I am one of the few scientists studying the importance of free expression, and how it is an absolutely crucial part of the mechanism society — and science — uses to stumble toward the truth.

I am an academic with a number of well-known discoveries, my sixth book appearing in a few months, and am also perhaps the only person arguing against the interventions that understands there was no “pandemic,” and has tried to educate people against their bias toward conspiracy-theory thinking.

You have made a huge mistake in suspending so many voices, including mine.

And, that is true whether or not what we're saying is true! Of course, I believe my statements are true, and always provide argument & evidence. Remember: nearly every journal article in the academic literature is false. But that doesn't mean it gets cancelled. It is part of the truth-discovery process itself.

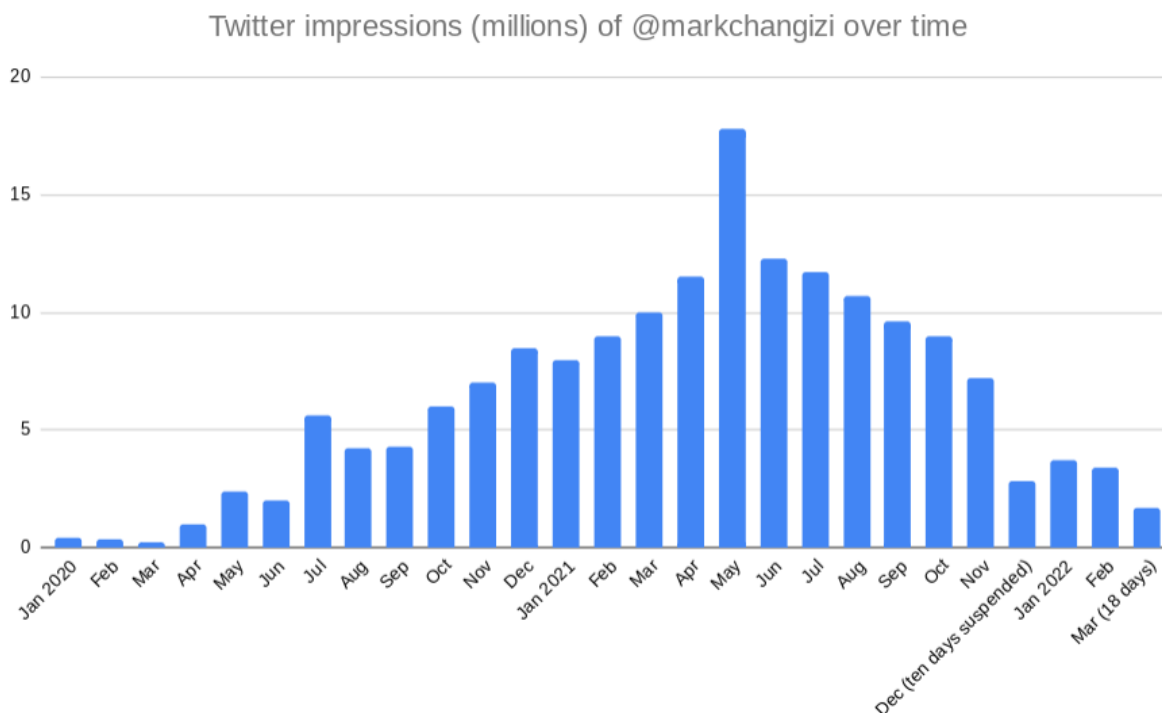
Don't become part of the problem by encouraging censorship and groupthink.

12. On December 27, 2021, Twitter unsuspended me without explanation, although I had to delete two Tweets (see 9a and 9b) to regain access to my account.

13. Nevertheless, my account is heavily censored: my Tweets are typically labeled "age-restricted adult content" that require an explicit effort to read them (in contrast to the vast majority of Twitter accounts). I still do not occur in a search unless my name is fully typed, and the same is true of my Instagram account.

14. My monthly Twitter impressions can be seen below, from January 2020 until the time of this writing. Although I began noticing my general de-platforming around December of 2021, it

had actually begun significantly earlier, around May of 2021.



15. Both my follower-ships on YouTube and Twitter accounts have plateaued, despite the fact that I am very active, and prior to the censorship period had steadily gained followers.

16. I have become very careful about what I say on Twitter to avoid suspension.

17. For example, I never discuss early treatments, as that leads to immediate suspensions.

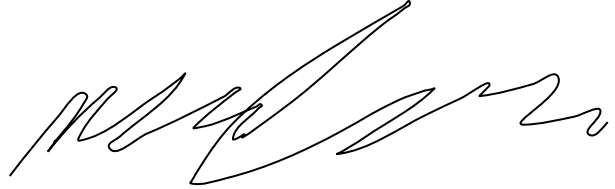
18. I avoid linking to studies and make very general statements when referring to the vaccines, which make my Tweets more difficult to comprehend.

19. I fear engaging with the opposition because angry opponents may report me to Twitter, increasing the chances of suspension.

20. Twitter notoriously suspends only those who question the wisdom and efficacy of government restrictions, or who cast doubt on the safety or efficacy of the vaccines.

21. Upon information and belief, there are no examples of Twitter suspending individuals who have spread misinformation from the other side—by, for example, exaggerating the efficacy of masks or the threat the virus poses to children.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read 'Mark Changizi', written in a cursive style.

Executed On: March 18, 2022

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Mark Changizi

Screenshot 1



**Hi Mark Changizi,  
Your account, @MarkChangizi has  
been locked for violating  
the **Twitter** Rules.**

Specifically for:

**Violating the policy on spreading misleading and  
potentially harmful information related to COVID-  
19.**

We understand that during times of crisis and instability, it is difficult to know what to do to keep yourself and your loved ones safe. Under this policy, we require the removal of content that may pose a risk to people's health, including content that goes directly against guidance from authoritative sources of global and local public health information.

For more information on COVID-19, as well as guidance from leading global health authorities, please refer to the following links:  
[Coronavirus disease \(COVID-19\) advice for the public from the WHO](#)  
[FAQs about COVID-19 from the WHO](#)



**Mark Changizi**  
@MarkChangizi

🔥 New Review: Masks Ineffective, Harmful 🚫 "The existing scientific evidences challenge the safety and efficacy of wearing facemask as preventive intervention for COVID-19." r Kb

Please note that repeated violations may lead to a permanent suspension of your account. Proceed to **Twitter** now to fix the issue with your account.

[Go to \*\*Twitter\*\*](#)

[Need some help?](#)

**Twitter**, Inc. 1355 Market Street, Suite 900 San Francisco, CA 94103



Screenshot 2



Hello Mark Changizi,

Your account, MarkChangizi has been suspended for violating the **Twitter Rules**.

Specifically, for:

**Violating our policy on spreading misleading and potentially harmful information related to COVID-19.**

You may not use **Twitter's** services to share false or misleading information about COVID-19 which may lead to harm.



**Mark Changizi**

avatar @MarkChangizi

@Chiding\_wisely @kiwinizzel1 @stephen\_PtC Covid is 10 to 20 times less danger than flu for kids. Get A. Grip. There is NO long term data for the shot. And even the short and medium term data for that age group are ambiguous at best. https://[...]



**Mark Changizi**

avatar @MarkChangizi

@MisterGoold @antinormz ~ Asymptomatics rarely spread it ~ Vaccinations don't slow spread ~ Unvaxxed pose no threat to vaxxed ~ Risks are broadly flu-like (and safer than flu for <40) ~ Huge % of unvaxxed have superior natural immunity via recovery

Note that if you attempt to evade a permanent suspension by creating new accounts, we will suspend your new accounts. If you wish to appeal this suspension, please contact our **support team**.

Screenshot 3

